

### REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-19 are currently pending. Claims 1, 9, and 11-18 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1-19 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,341,287 to Sziklai (hereinafter “the ‘287 patent”).

Applicants wish to thank the Examiner for the interview granted Applicants' representative on September 18, 2008, at which time the outstanding rejection of the claims was discussed. During the interview, the Examiner suggested that the claims be amended to clarify the plurality of databases recited in the claims have different storage formats and that the connecting parts are different. However, no agreement was reached pending the Examiner's further consideration upon formal submission of a further response to the outstanding Office Action.

Amended Claim 1 is directed to an integrating document management system including a processor for managing access to documents distributed over a computer network, the system comprising: (1) a plurality of different connecting parts configured to interface between a user interface part and a corresponding plurality of data processing parts, each data processing part associated with a respective different database, the connecting parts configured to implement common document management operations upon the different databases, each database having a different data storage format and a different interface. Further, Claim 1 clarifies that each connecting part includes (1) an interface that corresponds to a respective one of the plurality of databases, (2) a common interface that corresponds to the user interface part, and (3) a translating part configured to transform instructions and/or

data received from the user interface part into instructions and/or data that are compatible with the corresponding data processing part, and configured to transform instructions and/or data received from the corresponding data processing part into instructions and/or data that are compatible with the user interface part. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.<sup>1</sup>

Applicants respectfully submit that the rejection of Claim 1 (and all associated dependent claims) as anticipated by the '287 patent is rendered moot by the present amendment to Claim 1.

The '287 patent is directed to an integrated system for managing changes in regulatory and non-regulatory requirements for business activities at an industrial or a commercial facility. In particular, the '287 patent discloses a system that includes one or more databases that contain information on operations and requirements concerning an activity or area of business, and that the system receives information on regulatory and non-regulatory changes that affect operations of the business, and converts these changes into changes in data entry forms, data processing analysis procedures, and presentation of data processing results, without requiring the services of one or more programmers.

As shown in Figure 1, the '287 patent discloses that the '287 system is implemented in four different layers: a business content layer which "may be characterized as a business content data base,"<sup>2</sup> a metadata layer 15, a Java data management layer 13, and a change layer 11. In particular, the '287 patent discloses that the metadata model includes two components, a business content data dictionary and an application component. In particular, the data dictionary describes or defines the data elements of the application system and the business content layer and how a data element is recorded and managed at the database

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<sup>1</sup> See, e.g., element 12 in Figure 5 as well as steps S3 and S5 in Figure 9 and steps S15 and S17 in Figure 10, and the discussion related thereto in the specification.

<sup>2</sup> See '287 patent, column 12, line 21.

management system level.<sup>3</sup> Further, the '287 patent discloses that the application component of the metadata primarily records procedures for manipulating business information using data entry forms, worklists, processes, documents, reports, and business logic.<sup>4</sup>

Regarding the Java data management layer, the '287 patent discloses that this layer is implemented in Java and provides a graphical user interface for both the metadata layer and the business content layer, and allows a web browser user to communicate with the metadata and business content layers on a server.<sup>5</sup> Further, the '287 patent discloses that the Java data management layer and the metadata layer together server as a standard interface system that is positioned "on top of" one or more databases.<sup>6</sup> Thus, the '287 patent discloses that the interface to a database is implemented by the Java data management layer, but is effectively defined by the data in the metadata layer.<sup>7</sup> Thus, the '287 patent discloses a system in which there are no compatibility issues, and no need to translate instructions or data received from a user interface into instructions or data that are compatible with a corresponding data processing part/database, as required by Claim 1.

In particular, Applicants respectfully submit that the '287 patent fails to disclose a plurality of different connecting parts, each connecting part including (1) an interface that corresponds to a respective one of the plurality of databases, each database having a different data storage format and a different interface, (2) a common interface that corresponds to the user interface part, and (3) a translating part configured to transform instructions and/or data received from the user interface part into instructions and/or data that are compatible with the corresponding data processing part, and configured to transform instructions and/or data

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<sup>3</sup> See '287 patent, column 12, lines 23-30.

<sup>4</sup> See '287 patent, column 12, lines 30-33.

<sup>5</sup> See '287 patent, column 14, lines 63-67.

<sup>6</sup> See '287 patent, column 15, lines 60-63.

<sup>7</sup> See '287 patent, column 15, lines 7-8.

received from the corresponding data processing part into instructions and/or data that are compatible with the user interface part, as recited in Claim 1.

In particular, Applicants note that Claim 1 requires a **plurality of different connecting parts** configured to interface between a user interface part and a corresponding **plurality of data processing parts**. However, Applicants note that the Office Action does not specifically identify what the claimed plurality of data processing parts correspond to in the '287 patent as well as the plurality of connecting parts. In this regard, page 2 of the outstanding Office Action refers to column 15 and column 29 in the '287 patent as disclosing the plurality of data processing parts. However, column 15, lines 48-51 refers merely to the Java data management layer, while the passage in column 29 refers to the definition of a thin client. Thus, the Office Action appears to be equating a user device with the claimed plurality of data processing parts. However, regarding the claimed connecting parts, the Office Action appears to rely only on the disclosed Java data management layer, but Applicants note that Claim 1 requires a plurality of connecting parts corresponding to the plurality of data processing parts. Thus, it appears that the '287 patent only discloses a single Java data management layer, and not the plurality of different connecting parts recited in Claim 1.

Further, Applicants note that Claim 1 requires at least three interfaces: a user interface part, and as part of each connecting part, an interface that corresponds to a respective one of the plurality of databases, and a common interface that corresponds to the user interface part. Applicants respectfully submit that the Office Action does not clearly identify these three different interfaces recited in Claim 1, but appears to refer to an "integrated user interface" disclosed by the '287 patent.

Further, Applicants respectfully submit that the '287 patent fails to disclose the translating part recited in Claim 1. The discussion in columns 14 and 15 of the '287 patent

regarding the Java data management layer does not disclose any transformation of instructions or data received from a user interface part into instructions and/or data that are compatible with a corresponding data processing part, as recited in Claim 1. As discussed above, the '287 patent does not have any compatibility issues with regards to a plurality of databases correspond to a plurality of data processing parts, each database having a different data storage format and a different interface, but has a Java data management layer that is defined based on the metadata layer. Thus, the '287 patent discloses a system having built-in compatibility between the business content layer and the user interface, since the user interface implemented by the Java data management layer is based upon the metadata layer, which defines the content layer and the application components for manipulating the content layer.

Further, Applicants note that the Office Action appears to emphasize the fact that the '287 Java data management layer is implemented in Java, which is portable from one platform to another. Applicants submit that such portability is irrelevant to the limitations recited in Claim 1. Even if the Java data management layer disclosed by the '287 patent is implemented in Java that is portable from one machine to another, once it is implemented on a particular machine, it still does not perform the functions of the translating part recited in Claim 1. The '287 patent does not disclose that instructions and/or data are received from a user interface part are then translated into compatible instructions and/or data corresponding to a data processing part. As discussed above, the '287 patent has no need to translate instructions and/or data into compatible instructions and/or data since compatibility between the user interface and the database is built in to the system via the metadata.

Thus, for the reasons stated above, Applicants respectfully submit that the rejection of Claim 1 (and all associated dependent claims) as anticipated by the '287 patent is rendered moot by the present amendment to Claim 1.

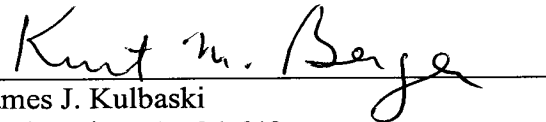
Independent Claim 9 recites a translating part and Claim 11 recites a means for translating. In particular, Claims 9 and 11 have been amended in a manner analogous to the amendment to Claim 1. As discussed above, these limitations are not disclosed by the '287 patent. Accordingly, for the reasons stated above, Applicants respectfully submit that the rejections of Claims 9 and 11 (and all associated dependent claims) as anticipated by the '287 patent are rendered moot by the present amendment to Claims 9 and 11.

Thus, it is respectfully submitted that independent Claims 1, 9, and 11 (and all associated dependent claims) patentably define over the '287 patent.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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